

RESPONSE TO OFFICE ACTION

This paper is submitted as a complete response to the office action mailed on August 20, 2002, for the referenced case ("the office action"). Claims 45-52 are currently pending. Reconsideration of the present application is respectfully requested in light of the following remarks.

Drawings

Section 2 of the office action noted that amended drawing figures provided with the response filed on June 11, 2002, were approved. The Examiner's acknowledgment of the drawing approval is appreciated. As the drawing corrections have been approved by the Examiner, Applicants believe no further drawing corrections are required in reply to the office action.

Claim Rejections – 35 USC § 112, first paragraph

Section 3 of the office action rejected claims 45-52 under 35 U.S.C. 112, first paragraph, as allegedly containing subject matter not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventors had possession of the claimed invention. Applicants respectfully traverse this rejection.

The office action alleges that the disclosure does not provide support for a "handle cam" or a "camming portion." The office action describes the Examiner's understanding of the disclosed structure, which generally appears to be accurate. Section 3 of the office action concluded by stating "Thus, it remains unclear as to what 'camming' action occurs."

In *Union Oil of California v. Atlantic Richfield Co. et al.*, the Federal Circuit stated

The written description requirement does not require the applicant to describe exactly the subject matter claimed, [instead] the description must clearly allow persons of ordinary skill in the art to recognize that [he or she] invented what is claimed.

208 F.3d 989, 997 (Fed. Cir., 2000) (citation omitted). Based on the written description and drawings of the present application, the Examiner was able to adequately describe the disclosed structure. That structure clearly allows persons of ordinary skill in the art to recognize that Applicants invented what is claimed.

As noted in Applicants' previous response, the dictionary defines a cam as "a rotating or sliding piece in a mechanical linkage used especially in transforming rotary motion into linear motion or vice versa." Merriam-Webster Dictionary (www.m-w.com). Hence, the *camming portion* is simply a rotating part that transforms the rotary motion of the handle into linear motion of the rod.

The "camming" action is accomplished by the camming portion 52 of the handle cam 46 essentially as described by the Examiner and in the present specification. The rotary motion of the handle 46 is transformed to linear motion of the rod 50 via the particular connection of the rod 50 to the camming portion 52, which is rotatably supported by annular bearings. "[W]hen handle cam 46 is pushed downward by an operator, the camming portion 52 of handle cam 46 provides a tension force to rod fence lock 50." Specification at 7. As described by the Examiner based on his analysis of the specification and drawings, "the tightening of, or the linear motion translated to, the rod 50 appears to be solely due to the eccentric connection of the rod to the camming portion...." Thus, the office action admits that the camming portion translates the rotational motion of the handle to the rod via the camming portion. Hence, the "camming action" – transforming the rotary motion of the handle to linear motion of the rod – is accomplished by the camming portion 52.

Applicants therefore respectfully submit that the written description, taken together with the drawings, clearly and completely provides support for the handle cam and the camming portion.

Claim Rejections – 35 USC § 112, second paragraph

Section 4 of the office action rejected claims 45-52 under 35 U.S.C. 112, second paragraph, as allegedly being indefinite. Applicants respectfully traverse this rejection.

MPEP 2111.01 states that words of a claim must be given their plain meaning. As noted herein above, a cam is simply a mechanism that translates rotational movement to linear movement. The plain meaning of *camming* does not require any specific structure, or more particularly, specific contact between one part and another.

The office action quotes the following recitation of claims 45 and 50: “to eliminate direct contact between the camming portion and the *housing*...” (emphasis added). The office action alleges that this phrase makes the claims unclear, stating that “it is not clear how any ‘camming’ can occur if there is no contact by the camming surface (i.e., if there is no ‘camming’ action, then it is not clear how the surface be a camming surface).” First, as noted above, the ordinary meaning of the claim terms does not require any specific contact between components. Moreover, there is no reference in the claim language to a “camming surface.” The claimed structure eliminates direct contact between that portion of the structure that translates rotational movement to linear movement and the housing. In contrast, prior art structures use direct contact between a camming portion and a wear plate to effect the translation of rotational movement to linear movement.